UNITED STATES DISTRICT COURT SOUTHERN DISTRICT NEW YORK

ARIADNA JACOB and INFLUENCES, INC.,

Case No. 1:21-cv-06807

Plaintiffs,

:

- against -

ORAL ARGUMENT REQUESTED

TAYLOR LORENZ and THE NEW YORK TIMES COMPANY,

:

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, Declaration of Katherine M. Bolger dated December 23, 2021, and Exhibits 1-6 annexed thereto, Defendants Taylor Lorenz and The New York Times Company (collectively, "Defendants") by and through their undersigned counsel, will move this Court before the Honorable Edgardo Ramos at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing Plaintiffs' First Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Pursuant to the Court's November 12, 2021 minute order, Plaintiffs' opposition must be filed by January 20, 2022, and any reply by Defendants must be served by February 3, 2022.

Dated: New York, New York December 23, 2021

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Katherine M. Bolger

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Attorney for Defendants Taylor Lorenz and The New York Times Company